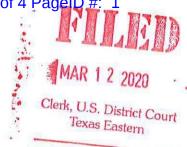
Case 4:20-cr-00094-SDJ-KPJ Document 1 Filed 03/12/20 Page 1 of 4 PageID #: 1

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION



| UNITED STATES OF AMERICA | § | SEALED |
|---------------------------|--------|------------|
| v. | § § | No. 4:20CR |
| | § | Judge Jorg |
| SALOMON ALEXANDER GARCIA- | § | 00.0 |
| VARGAS (1) | § | |
| SANTOS LOUVET LUNA- | § | |
| HERNANDEZ (2) | § | |
| CARLOS EDUARDO MUNIZ- | § | |
| GARCIA (3) | § | |
| | | |

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute Cocaine)

That from sometime on or about January 2020, and continuously thereafter up to and including March 12, 2020, in the Eastern District of Texas and elsewhere,

Salomon Alexander Garcia-Vargas Santos Louvet Luna-Hernandez Carlos Eduardo Muniz-Garcia

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture and distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

Count Two

Violation: 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about March 4, 2020, within the Eastern District of Texas, **Santos Louvet Luna-Hernandez**, defendant, did knowingly possess a firearm, namely, a Smith and Wesson pistol, Serial Number FWS2032, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to distribute cocaine.

In violation of 18 U.S.C. § 924(c).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

Smith and Wesson pistol, Serial Number FWS2032 including magazines and ammunition seized from **Santos Louvet Luna-Hernandez**; and

\$3,721.00 in U.S. currency seized from Carlos Eudardo Muniz-Garcia.

A TRUE BILL

GRAND JURY FOREPERSON

JOSEPH D. BROWN

UNITED STATES ATTORNEY

ERNEST GONZALEZ

Assistant United States Attorney

3/12/2020

Date

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

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Count One

Violation:

21 U.S.C. § 846

Penalty:

If 5 kilograms or more of a mixture or substance containing a detectable

amount of cocaine -- not less than 10 years and not more than life

imprisonment, a fine not to exceed \$10 million, or both; supervised release

of at least five years.

Special Assessment: \$100.00

Count Two

Violation:

18 U.S.C. § 924(c)

Penalty:

Imprisonment for not more than five years to be served consecutive with

any other term; a fine not to exceed \$250,000, or both; a term of supervised

release of not more than five years.

Special Assessment: \$100.00